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September 27, 2004

Kenneth N. Weinstein
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Re: Part 573 Defect Information Report

Dear Mr. Weinstein:

Pursuant to the requirements of 49 C.F.R. Part 573, we are submitting the following report related to certain tires manufactured under Federal Motor Vehicle Safety Standards (FMVSS) No. 119 (New Pneumatic Tires for Vehicles Other Than Passenger Cars) and FMVSS 109 (New Pneumatic Tires).

Pursuant to 49 C.F.R. § 573 MNA reports the following:

573.6(c)(1) Name of Manufacturer:

Michelin North America, Inc.

573.6(c)(2)(iii) Items Potentially Containing the Defect:

Approximately 3,500 tires manufactured at the Woodburn (Fort Wayne) Indiana plant during DOT weeks 15 and 16 in 2004 (the weeks beginning 11 and 18 April) are concerned. As identification of tires in the field is limited to the plant code and date characters in the Tire Identification Number on the sidewall, the "Subject Tires" will include approximately 46,000 tires manufactured during the above two weeks in the following brands and sizes:

1. LT235/75R15 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL 104/101 Q
2. 33X12.50R15 BFGoodrich All-Terrain T/A^{KO} RWL Load Range C 108Q
3. P245/75R16 BFGoodrich Land Terrain
4. LT235/70R16 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL
5. LT235/75R15 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL 104/101 S
6. P255/70R16 Liberator A/T
7. 33X12.50R15 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL 108R - DOT 2004 15 16

Michelin North America, Inc.

Industry Standards & Government Regulations
513 Michelin Road
Post Office Box 1987
Greenville, SC 29602-1987

8. P255/70R16 109S Medalist Trail A/P ORWL
9. P255/70R16 Medalist Sport King A/T Steel Radial
10. P255/70R16 109S Phantom AP RWL
11. P255/70R16 American Prospector AP RWL
12. P245/75R16 Uniroyal Laredo AWP
13. P265/75R16 114S Uniroyal Laredo AWP ORWL
14. P255/70R16 Uniroyal Laredo AWP
15. P265/75R15 SL112S Uniroyal Laredo A/S AWP

573.6(c)(3) Total Number of Tires Potentially Containing the Defect:

We believe that a maximum of 3,500 of the Subject Tires described in 573.6(c)(2)(iii) above and manufactured in DOT weeks 15 and 16, 2004 are potentially affected.

573.6(c)(4) Percentage of Tires Estimated to Actually Contain the Defect:

We believe that up to 100% of the approximately 3,500 tires described above could contain the defect.

573.6(c)(5) Description of the Defect

The tires will manifest a lack of adhesion between the steel belt cords and the surrounding rubber matrix, which could lead to premature tire failure. This will initially cause a discernable ride or vibration anomaly. There may also be a visual indication, in the form of a bulging in the shoulder/tread edge area of the tire. We are presently unaware of any tread/belt detachments associated with this issue.

573.6(c)(6) Basis For Determination of Defect:

A quantity of 6 tires were returned through our warranty system for ride or vibration complaints. Examination of these returned tires alerted the Company to this issue. Further investigation has shown that some steel belt material was processed with an incorrect rubber, and ultimately used in the manufacturing process of the affected tires.

573.6(c)(8) Remedy Program:

MNA will initiate a voluntary safety recall for all Subject Tires. The U.S. consumers that may have purchased tires containing the condition described above will be contacted by first class mail beginning the week of October 4, 2004. This correspondence will explain the issue and include specific instructions as to how to obtain replacement tires without


charge, as well as procedures for collecting reimbursement for remedies made prior to the recall, where appropriate.

Additional verification and control steps have been implemented in our manufacturing process, including modifications in the frequency of physical testing as well as bolstered verification procedures.

573.6(c)(10) Owner Notification

A draft of MNA's owner notification letter is enclosed, for which we ask the Agency's prompt approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael I. Wischhusen", with a long horizontal flourish extending to the right.

Michael I. Wischhusen
Director, Industry Standards &
Government Regulations
Michelin North America, Inc

Reimbursement to Customers for Replacement Prior to Recall

If you have already paid to have your tires replaced due to failures related to this specific recall, you may be eligible to receive reimbursement.

Requests for reimbursement may include parts, labor, fees and taxes. Reimbursement may be limited to the amount the replacement would have cost if completed by an authorized BFGoodrich Tires dealer. The following documentation must be presented to your dealer for reimbursement.

Original or clear copy of all receipts, invoices and/or repair orders that show:

- The name and address of the person who paid for the replacement
- The model name and size of the tire that was replaced
- What problem occurred, when the tire was replaced and who replaced it
- The total cost of the repair expense that is being claimed.
- Proof of payment of repair (copy of front and back of cancelled check, or copy of credit card receipt).
- Reimbursement will be made by check from the company. If your claim is denied you will receive a letter within 60 days of receipt with the reason(s) for the denial.

Please speak with your dealer concerning this matter.

If you have any questions or concerns about this recall, please call BFGoodrich Tires at 1-877-7788-8888 or Uniroyal Tire at 1-877-448-8878 between 8:30 a.m. and 6:00 p.m. eastern standard time, Monday through Friday.



FOR IMMEDIATE RELEASE

BFGOODRICH TIRES ANNOUNCES RECALL

Company's Quality System Results in Early Action to Assure Performance

GREENVILLE, S.C. (Sept. 29, 2003) – BFGoodrich Tires is recalling 46,000 passenger and light truck tires after its quality system alerted the company to a condition initially affecting ride quality, but which could possibly result in steel belt separation if not addressed.

To date, there have been no accidents or injuries reported and no property damage claims filed. However, the company's thorough investigation indicates there may be similar performance issues with up to 3,500 tires, representing six tire brands. In order to reclaim that small number of tires, the company is recalling all potentially affected tires produced during the same period in a comprehensive commitment to retrieve from the market any tire that doesn't perform to BFGoodrich Tires quality standards.

"This decision was made based on six tires returned from service prematurely after consumers experienced tire vibration, noise and ride comfort issues," explained Michel Default, quality director for BFGoodrich Tire Manufacturing. "Based on our analysis of these returned tires, we've discovered an issue with one of the semi-finished products sent to our FL Wayne, Ind. facility and used in the production of up to 3,500 tires at the end of the 15th week and beginning of the 16th week (April) this year. That issue has been addressed and corrected. Fortunately, the issue was identified very early and we are acting in a comprehensive manner to assure consumer satisfaction and safety."

BFGoodrich Tires informed the NHTSA on Sept. 27, 2004 of its U.S. recall campaign and is beginning an intensive communication with dealers, wholesalers and consumers potentially impacted. All recalled tires will be replaced free of charge and returned to BFGoodrich Tires.

The recalled tires have Department of Transportation tire identification numbers which begin with DOT BF and end with the last four digits 1504 or 1604. The DOT codes are found on the inner or outer sidewall of the tire just above the wheel rim and are printed in small type (less than half an inch tall). There are no issues with tires manufactured outside of these DOT weeks.

All of the recalled tires were produced in week 15 and 16 this year (April 11-24, 2004) at the FL Wayne facility and include BFGoodrich, Uniroyal, Liberator, Medalist, Phantoms and Prospector brands in the following dimensions:

LT235/75R15 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL
33X12.50R16 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL
LT235/70R16 BFGoodrich All-Terrain T/A^{KO} Load Range C RWL
P245/75R16 BFGoodrich Land Terrain

P255/70R16 Liberator A/T

P255/70R16 108S Medalist Trail A/P ORWL
P255/70R16 Medalist Sport King A/T Steel Radial

P255/70R16 108S Phantom AP RWL

P255/70R16 American Prospector AP RWL

P245/75R16 Uniroyal Laredo AWP

P285/75R18 114S Uniroyal Laredo AWP ORWL

P255/70R16 Uniroyal Laredo AWP

P265/75R15SL112S Uniroyal Laredo A/S AWP

BFGoodrich Tires has begun contacting dealers and wholesalers in the United States to recall as many tires as possible from dealer inventories and to gather information on consumers who have purchased the tires involved. Affected consumers will be contacted by first class mail. Appropriate related actions will be conducted in other countries that received the recalled tires.

Any consumer who believes they are affected by the recall should not wait to receive notification but should call BFGoodrich Tires at 1-877-788-8899 or Uniroyal Tire at 1-877-458-5878 or return to their point of purchase for a free inspection and replacement of affected tires. Additional information, including details on how to determine which tires are affected, can be found online at www.bfgoodrichtires.com/recall and www.uniroyal.com/recall.

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NOTE TO EDITOR: Attached is an illustration of how to read a sidewall DOT code to assist consumers in determining if their tires are impacted by the recall.

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